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January 10, 2025

**VIA ECF**

Judge Frederic Block  
U.S. District Court for the New York Eastern District  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Haney et al. v. Garcia et al.*, No. 24-cv-6845

Dear Judge Block:

We represent Defendant Ryan Garcia (“Garcia”) in the above-referenced proceeding. Pursuant to Rule 2.A of Your Honor’s Individual Motion Practices and Rules, we write in response to Plaintiffs Devin Haney and Devin Haney Promotions, Inc.’s (“Plaintiffs”) request for a pre-motion conference for a motion to dismiss Garcia’s Counterclaims (Dkt. 32) (the “Pre-Motion Letter”).

On September 27, 2024, Plaintiffs filed their Complaint against Garcia. Dkt. 1. On December 4, 2024, Garcia filed his Answer, Affirmative Defenses, and Counterclaims in response to Plaintiffs’ Complaint. Dkt. 19. However, on December 19, 2024, Plaintiffs filed their First Amended Complaint. Dkt. 27. Garcia’s response to the First Amended Complaint is due Thursday, January 16, 2025. *See* Dkt. 30. Accordingly, the Pre-Motion Letter—and any motion to dismiss the Counterclaims—is premature at this time.

We remain available to discuss this matter at the Court’s convenience.

Respectfully submitted,

/s/ Reena Jain

Reena Jain

cc: Counsel of Record (via ECF)